

REMARKS

Claims 12-16 now stand in the application, certain claim amendments having been made for clarity. Reconsideration of the application and allowance of all claims are respectfully requested in view of the above amendments and the following remarks.

Entry of the above amendments is respectfully requested in that the amendments to the preamble of claim 12 are simply to positively recite steps in accord with US practice, and the addition of the word “automatic” later in the claim is simply to be exact in terms of antecedent basis. The amendment to claim 16 is simply to make the issue of patentability of claim 16 the same as for claim 14, if anything simplifying issues on appeal.

The rejection of claim 12 under 35 USC § 101 is respectfully traversed. Claim 1 is directed to a method of processing postal items where an image is formed of each item and then OCR is performed on the image in order to perform automatic address recognition, with the address being used to forward the item to a sorting output of the sorting machine. This is all recited in the preamble of claim 1 and is clearly statutory subject matter. It is not proper to then look only at the last part of the claim and conclude that it is non-statutory. The claim in its entirety must be considered. The method of processing postal items according to the invention is tied to a particular machine, namely sorting machine provided with sorting outputs which are positively recited in claim 1. Accordingly, withdrawal of this rejection is requested.

The prior art rejections are respectfully traversed.

As well known in postal field, address information is divided into outward addressing information which are country, town and post code, and inward addressing information which include street number, street name, door number (see application page 2 line 2 to page 3 line 5). Delivery points resulting from recognition processing in claim 1 relate to inward addressing

information as it is well known in the art and explained in the present application page 9 lines 21-33, whereas zip-codes (post codes) relate to outward addressing information. These inward and outward addressing information are different types of information with different level of hierarchy, this induces different types of sorting steps (see steps 5-7 and 8-9 in the application).

Ross seeks to resolve an ambiguity by checking to see if the specific address recognized by the system exists in the zip code recognized by the system. It does this in order to resolve an ambiguity where multiple different addresses are possible. But Ross is not detecting if each of several delivery points are included in a single delivery round. This is because (1) a zip code is not a “delivery round” according to any reasonable interpretation of that word, and (2) Ross is not seeking to detect “if said delivery points are included in a single delivery round” as is recited in claim 1, but if any delivery points are not valid addresses.

Vaghi (US2004/0064326) discloses a postal sorting process in which mail items are pre-sorted based on zip-codes only (see paragraph [82]). In Vaghi, address information is read on postal items and the zip-code is extracted from the address information for directing postal items toward a sorting bin that is associated with said particular zip-code (see paragraph [86] and [88]). Then in paragraph [89], Vaghi teaches the counting of postal items per sorting bin since 500 postal items are required by post code to get a discount from postal operator.

The examiner has proposed modifying Ross in view of Vaghi. For this to have been obvious, one would have to have some motivation for the modification. Vaghi presorts by zip code to see how many items fall within each zip code. If one were to incorporate this feature into Ross, Ross would then also count how many items fall within each zip code. But Vaghi does not Vaghi teach controlling a sorting machine such that the number of pieces in a particular

zip code is compared to a threshold value to forward the item to a sorting outlet. In Vaghi, the comparison to a threshold value is solely for the purpose of determining a discount, and has no bearing on routing or sorting.

Ross also does not teach or suggest any reason why one would take into account the number of items in a zip code in making a sorting or routing decision. Ross is simply trying to find out if any one address is valid. Since neither reference teaches taking into account the number of items in a particular zip code in making sorting decisions in a sorting machine, this feature would not result from any obvious combination of the teachings of the two references.

Further, it is noted that claim 1 recites that the delivery points identified correspond to different ambiguous solutions of the address recognition process. Combining Ross with the teachings of Vaghi in such a way as to satisfy claim 1 would require that the modified system count how many ambiguous addresses are included in a single zip code. This makes no sense at all.

And all of this ignores the fact that a zip code is not a delivery round. In other words, even reading the claim language such that a zip code corresponds to a claimed “delivery round,” there is no obvious combination of the teachings of the references which would lead to the claimed subject matter.

The process described in Ross is a process of achieving unambiguous address recognition. The present invention is about what to do when that fails. Efforts to obtain unambiguous address resolution are described up through step 9 (see lines 12-15 of page 9 of the present specification). Rather than simply reject the item when unambiguous resolution cannot be achieved, the present invention is seeking to reduce the rejection rate (see page 2 lines 23-27 of the specification). But the invention is not conclusively determining if an address is valid.

What it is doing is seeing if, e.g., two possible alternatives for a particular address from an ambiguous OCR recognition result are both in the same delivery round of the postman. If they are, then there is a low cost of allowing the ambiguity, because the postman can resolve the ambiguity during the delivery round. (see page 3, lines 27-32 of the specification) And the burden on the postman of having to resolve the ambiguity during the delivery round is more of a problem if the postman already has to deal with a large volume of mail in the delivery round. So the present invention (1) checks to see if the different ambiguous addresses are in the same delivery round and (2) if they are in the same delivery round, checks to see if that delivery round has a high volume of mail to be delivered.

The claim language is directed to this process, and in attempting to read the claim language on something that has nothing to do with this, there are inevitably flaws in the claim reading and in the case for obviousness. Ross is not trying to determine if multiple ambiguous addresses are in the same delivery round, but is instead trying to eliminate ambiguity. Vaghi does not computer a volume of mail in a delivery round “in response to said detection” that delivery points are included in a single delivery round. Combining the teachings of the references would not result in these features, absent hindsight after reviewing the present application.

For these and the many other reasons given above, it is submitted that the claimed invention would not have been obvious from the teachings of the cited art.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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